

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI

STACY ARNOLD,

Plaintiff,

v.

CITY OF ST. JOSEPH, ST. JOSEPH
PUBLIC LIBRARY and OFFICER
REBECCA HAILEY,

Defendants.

Case No. 5:19-CV-06137-BP

DECLARATION OF SARA WHITTEN

COMES NOW, Sara Whitten, upon her oath and upon penalty of perjury, and states as follows:

1. I am above the age of 18, have personal knowledge of the facts contained in this declaration, and am competent to testify as to the facts stated herein.
2. I am a Senior Library Assistant for the East Hills Library, a library within the St. Joseph Public Library branch.
3. On January 30, 2018, I was working the front desk at the East Hills Library.
4. While working the front desk, I received multiple complaints from library patrons who were being “accosted” by a woman, Ms. Arnold, as they were getting into or out of their vehicles in the parking lot.
5. To confirm such complaints, I looked out of a window and witnessed Ms. Arnold approaching people’s vehicles.
6. Maryann Knorr, on behalf of East Hills Library, then contacted East Hills Mall Security.

7. There was no conspiracy between me and any other person to deprive Plaintiff of any of her Constitutional rights.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Further declarant sayeth not.

Executed on September 23, 2020.



Sara Whitten